

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

**MICHAEL THOMAS COOK,
a/k/a MICHAEL T. COOK,
a/k/a MICHAEL COOK,
and SAMANTHA ANN ROBAYO,
a/k/a SAMANTHA A. ROBAYO,
a/k/a SAMANTHA ROBAYO,
a/k/a SAMANTHA ANN ROBAYO-
FREYMUTH,
a/k/a SAMANTHA A. ROBAYO-
FREYMUTH,
a/k/a SAMANTHA ROBAYO-FREYMUTH,**

Debtors.

CASE NO. 5:23-BK-00772-MJC

CHAPTER 13

NOTICE OF APPEARANCE

**NOTICE OF APPEARANCE AND DEMAND FOR SERVICE ON BEHALF OF
HERITAGE FINANCIAL CREDIT UNION,
FORMERLY HUDSON HERITAGE FEDERAL CREDIT UNION**

PLEASE TAKE NOTICE that the undersigned, James T. Shoemaker, Esquire, of the law firm of Hourigan, Kluger & Quinn, P.C., as agent for Heritage Financial Credit Union, and pursuant to Federal Rules of Bankruptcy Procedure 2002(g), 2002(i) and 9007, demands that all notices that are required to be given in this case be given to and served upon the undersigned, at the office address and telephone number set forth below:

James T. Shoemaker, Esquire
Hourigan, Kluger & Quinn, P.C.
600 Third Avenue
Kingston, PA 18704
(570) 287-3000

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, and demand, whether formal or informal, whether written oral or whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, facsimile, email, or otherwise which:

(1) affect or seek to affect in any way any of the creditor's rights or interest, with respect to:

- (a) the Debtors;
- (b) property or proceeds thereof in which the Debtors may claim an interest; or
- (c) property or proceeds thereof in possession, custody, or control of the creditors which the Debtors may seek to use; or

(2) require or seek to require an act, delivery or property or other conduct by the creditors.

Respectfully submitted:

HOURIGAN, KLUGER & QUINN, P.C.,

Dated: April 12, 2023.

By: /s/ James T. Shoemaker

James T. Shoemaker, Esquire

I.D. No. 63871

*Counsel for Heritage Financial
Credit Union*

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**MICHAEL THOMAS COOK,
a/k/a MICHAEL T. COOK,
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FREYMUTH,
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Debtors.

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CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I, James T. Shoemaker, Esquire, hereby certify that I am serving a true and correct copy of Heritage Financial Credit Union's Notice of Appearance upon the Debtors and Debtors counsel by electronic filing with the United States Bankruptcy Court for the Middle District of Pennsylvania, and/or depositing said documents in the United States mail, first class, postage prepaid, addressed as follows:

Vincent Rubino
Newman Williams Mishkin Corveleyn, et al.
712 Monroe Street
P.O. Box 511
Stroudsburg, PA 18360-0511
Attorney for Debtors

Michael Thomas Cook
162 Overbrook Run
Milford, PA 18337
Debtor 1

Samantha Ann Robayo
162 Overbrook Run
Milford, PA 18337
Debtor 2

[SIGNATURE PAGE TO FOLLOW]

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Respectfully submitted:

HOURIGAN, KLUGER & QUINN, P.C.,

Dated: April 12, 2023.

By: /s/ James T. Shoemaker

James T. Shoemaker, Esquire

I.D. No. 63871

*Counsel for Heritage Financial
Credit Union*